

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
XRAMP TECHNOLOGIES, INC. and  
XRAMP SECURITY SERVICES, INC.,  
Plaintiffs,

v.

\_\_\_\_\_  
GEOTRUST, INC. and  
CHRISTOPHER BAILEY,  
Defendants.

Civil Action No. 05-11374-RCL

\_\_\_\_\_  
GEOTRUST, INC.,  
Counterclaim Plaintiff,

v.

\_\_\_\_\_  
XRAMP TECHNOLOGIES, INC. and  
XRAMP SECURITY SERVICES, INC.,  
Counterclaim Defendants.

**XRAMP TECHNOLOGIES, INC. AND XRAMP SECURITY SERVICES, INC.'S  
MOTION FOR LEAVE TO FILE RESPONSE TO GEOTRUST'S MOTION TO COMPEL  
THE PRODUCTION OF DOCUMENTS AND INTERROGATORY ANSWERS LATE  
AND CROSS-MOTION FOR PROTECTIVE ORDER**

Pursuant to Local Rule 6(b) and Rules 26 and 34 of the Federal Rules of Civil Procedure, the plaintiffs and counterclaim defendants, XRamp Technologies, Inc. and XRamp Security Services, Inc. ("XRamp") hereby moves for leave to respond to the Motion to Compel the Production of Documents and Interrogatory Answers of the defendants and counterclaim plaintiffs, GeoTrust, Inc. and Christopher Bailey ("GeoTrust") late -- by one business day.

As grounds, XRamp states that:

1. Its response to GeoTrust's Motion to Compel was due on or before Friday, March 31, 2006.
2. Counsel for XRamp attempted to resolve informally all issues raised by GeoTrust's motion by complying with all discovery requests that were non-privileged and/or confidential prior to the March 31<sup>st</sup> deadline by: a) furnishing a box filled with hundreds of documents on March 27<sup>th</sup>, and b) subsequently discussing these issues with counsel including a telephone conversation, as recently as, March 31<sup>st</sup>.
3. When it became clear that informal resolution was impossible, counsel for XRamp prepared the accompanying response and gathered the accompanying exhibits. Counsel then attempted to file this response electronically before the 6:00 p.m. deadline on March 31<sup>st</sup>. Unfortunately, counsel experienced technical difficulties, which has delayed the filing. Nonetheless, in order to provide timely notice to counsel for GeoTrust, counsel for XRamp served a copy of the response and exhibits on GeoTrust by facsimile transmission before the 6:00 p.m. deadline.
4. XRamp submits that its counsel has tried to act diligently throughout the past two-week period of time for weighing its response. XRamp produced hundreds of documents. It attempted an informal resolution. It attempted to file its response electronically in a timely fashion -- only to experience technical difficulties when the Adobe Store connected with the Court's web site was not in service. Its counsel, a two-attorney firm, had been involved in conflicting demands including a multi-day trial before an Arbitrator this past week.
5. GeoTrust received a copy of XRamp's response via facsimile transmission before the

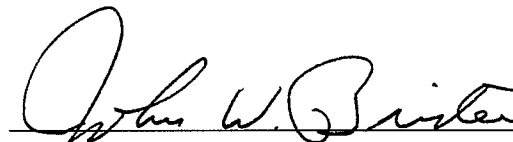
deadline lapsed, and would not appear to be prejudiced in the circumstances.

WHEREFORE, XRamp moves that the Court allow this motion and permit it to file the accompanying response to GeoTrust's Motion to Compel late -- by one business day.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), XRamp believes that oral argument would assist the Court in understanding the context of this motion and also XRamp response to GeoTrust's motion to compel, and therefore requests the opportunity to address these issues in a hearing.

Respectfully submitted,

A handwritten signature in cursive script, reading "John W. Brister", written over a horizontal line.

John W. Brister, BBO #057420  
BRISTER & ZANDROW, L.L.P.  
268 Summer Street  
Boston, Massachusetts 02210-1108  
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Date: April 3, 2006